

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Ronald H Gray
Lois R Gray
Debtors

Case No. 11-52804
Chapter 13
Judge Caldwell

**DEBTORS' MOTION TO SELL THE 2006 FORD FUSION
AND THE 2003 FORD ESCAPE MOTOR VEHICLES**

Now come the Debtors, by and through counsel, pursuant to Bankruptcy Rule 6007, and move for an order allowing them to sell their 2006 Ford Fusion and 2003 Ford Escape motor vehicles, and requiring the lien holders to release their liens. The basis of Debtors motion is outlined more fully below.

Respectfully submitted,

/s/ Donald E Wood, Esq.
Attorney for the Debtors

MEMORANDUM IN SUPPORT

The Debtors have a 2006 Ford Fusion automobile that was purchased in 2009. At the time of the filing of the case, Debtors owed \$12,674.89 on the vehicle. A claim (Claim No. 2) was filed by Santander USA on March 24, 2011, as the lien holder on the vehicle. The claim was subsequently assigned to National Capital Management LLC on January 12, 2013. A review of the Trustee's records indicates that the claim (Claim No. 2) has been paid-in-full as of the date of this motion.

The Debtors also have a 2003 Ford Escape automobile. At the time of filing of the case, Debtors owed \$6,313.80 on the vehicle. Credit Acceptance Corporation is the lien holder on the vehicle. They filed a claim (Claim No. 1) on March 24, 2011. A review of the Trustee's records indicates the claim has been paid-in-full.

Based on the foregoing, Debtors respectfully request an order requiring the lien holders to release their liens, thereby allowing the Debtors to sell the vehicles and apply the proceeds from the sales to the purchase of a replacement vehicle.

Respectfully submitted,

/s/ Donald E Wood, Esq.
4437 Wright Avenue
Whitehall, OH 43213
614-235-8078
dwood4@insight.rr.com

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**NOTICE OF DEBTORS' MOTION TO SELL THE 2006 FORD FUSION
AND THE 2003 FORD ESCAPE MOTOR VEHICLES**

THE DEBTORS HAVE FILED PAPERS WITH THE COURT TO GRANT APPROVAL OF THE ATTACHED MOTION PERMITTING THE DEBTORS TO SELL THE 2006 FORD FUSION AND THE 2003 FORD ESCAPE MOTOR VEHICLES.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT COUNSEL. IF YOU DO NOT WANT THE COURT TO GRANT THE MOTION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THIS MOTION, THEN ON OR BEFORE TWENTY-ONE (21) DAYS FROM THE DATE OF THE MAILING OF THIS NOTICE, YOU OR YOUR ATTORNEY MUST:

FILE WITH THE COURT A WRITTEN OBJECTION TO THE MOTION STATING THEREIN THE BASIS FOR YOUR OBJECTION. THIS PLEADING MUST BE FILED WITH THE CLERK OF COURT, UNITED STATES BANKRUPTCY COURT, 170 N. HIGH STREET, COLUMBUS, OHIO 43215. IF YOU MAIL YOUR RESPONSE TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL RECEIVE IT ON OR BEFORE THE DATE STATED ABOVE.

YOU MUST ALSO MAIL A COPY TO:

Donald E Wood, Esq.
4437 Wright Ave
Whitehall, OH 43213

U.S. Trustee
170 N. High Street
Columbus, OH 43215

Frank M Pees
Chapter 13 Trustee
130 E Wilson Bridge Rd
Worthington, OH 43085

IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY ENTER AN ORDER GRANTING THE MOTION WITHOUT FURTHER HEARING OR NOTICE.

Respectfully submitted,

/s/Donald E Wood, Esq.
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Whitehall, OH 43213
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dwood4@insight.rr.com

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**CERTIFICATE OF SERVICE - DEBTORS' MOTION TO SELL THE
2006 FORD FUSION AND 2003 FORD ESCAPE MOTOR VEHICLES**

I herby certify that on March 17, 2015, a copy of the foregoing Notice of Debtors' Motion to Sell the 2006 Ford Fusion and the 2003 Ford Escape Motor Vehicles was **electronically** served on the following ECF participants at the email address registered with the court:

Asst US Trustee(Col) ustpregion09.cb.ecf@usdoj.gov
Jennifer Fate fate@mmmb.com, matthew@mmmb.com
Brian M Gianangeli bgianangeli@mifsudlaw.com
Frank M Pees trustee@ch13.org
Donald E Wood dwood4@insight.rr.com

and on the following by **ordinary U.S. Mail**:

National Capital Management LLC
PO Box 12786
Norfolk VA 23541

Credit Acceptance Corp
25505 W 12 Mile Road Ste 3000
Southfield MI 48034

Internal Revenue Service
PO Box 7346
Philadelphia PA 19101-7346

Ohio Dept of Taxation
Bankruptcy Division
PO Box 530
Columbus OH 43216

Jefferson Capital System LLC
PO Box 7999
Saint Cloud MN 56302-9617

Cashland
17 Triangle Park
Cincinnati OH 45246

ODJFS
Litigation Unit – Unemp Comp
PO Box 182404
Columbus OH 43218-2404

East Bay Funding LLC
c/o Resurgent Capital Services
PO Box 288
Greenville SC 29603

Accelerated Revenue
4016 N Hampton Dr
Powell OH 43065

Always Loan LLC
1980 Hard Rd
Columbus OH 43235-1809

AFNI
PO Box 223721
Dallas TX 75222-3721

Alexander Vaneck Co LPA
5660 Southwyck Blvd #110
Toledo OH 43614-1597

B-Real LLC
MS550
PO Box 91121
Seattle WA 98111-9221

Cash Yes.com
PO Box 96503
Wilmington DE 20090-6503

Choice Recovery Inc
1550 Old Henderson Rd Ste100
Columbus OH 43220-3662

Grant Anesthesia Serv Ltd
L2736
Columbus OH 43260-0001

Grant Riverside Med Care Found
5350 Frantz Rd
Dublin OH 43016-4259

Key Bridge
2348 Baton Rouge
Lima OH 45805-1167

Magnum Cash Advance
1403 Foulk Rd Ste 203
Wilmington DE 19803-2788

Marlin Medclr Inovision
507 Prudential Rd
Horsham PA 19044-2308

National Check Cashers
PO Box 12699
Columbus OH 43212-0699

Nuvell Credit
PO Box 380901
Bloomington MN 55438-0901

Ohio Hlth GRMCF-GMC MIO
5350 Frantz Rd
Dublin OH 43016-4259

PMAB LLC
PO Box 12150
Charlotte NC 28220-2150

CashNet USA
200 W Jackson Suite 1400
Chicago IL 60606-6929

Credit Collection Services
Two Wells Ave Dept 9134
Newton MA 02459-3225

Debit Credit Services
1799 Akron Penninsula Rd #120
Akron OH 44313-4847

First Bank of Delaware
50 S 16th St
Philadelphia PA 19102-2516

Grant Medical Center Ohio Hlth
PO Box 182140
Columbus OH 43218-2140

International Cash Advance
1403 Foulk Rd Ste 203
Wilmington DE 19803-2788

Loan Shop
2207 Concord Pike Ste 250
Wilmington DE 19803-2908

Meade & Assoc
737 Enterprise Dr
Westerville OH 43081-8841

National Recovery Services
PO Box 170800
Milwaukee WI 53217-0800

Ohio Health Riverside Hosp
5350 Frantz Rd
Dublin OH 43016-4259

PCB
PO Box 29917
Columbus OH 43229-7517

RCL Finance Inc
715 W Abram
Arlington TX 76013-6902

Santander Consumer USA Inc
dba Drive Financial Services
8585 N Stemmons Fwy Ste 1100-N
Dallas TX 75247-3822

UCB
5620 Southwyck Blvd Ste 206
Toledo OH 43614-1501

Ohio State University
c/o Brian M Gianangeli
Law Office of Charles Mifsud LLC
326 S High St Annex – Ste 201
Columbus OH 43215

Jennifer L Fate
Murray Murphy Moul & Basil LLP
1533 Lake Shore Drive
Columbus OH 43204

Donald E Wood, Esq.
/s/ Donald E Wood, Esq.